

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

Case: 4:23-cr-20358

Judge: Kumar, Shalina D.

MJ: Ivy, Curtis Filed: 06-21-2023

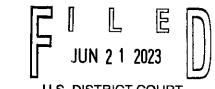
INDI USA v. Eric Whited, et al (tt)

v.

D-1 ERIC D. WHITED, and

DOMINIQUE P. FRALEY, D-2

Defendants.



Violations:

U.S. DISTRICT COURT

18 U.S.C. § 924(o) 18 U.S.C. § 922(g)(1)

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

CONSPIRACY TO CARRY A FIREARM DURING AND IN RELATION TO A DRUG TRAFFICKING CRIME 18 U.S.C. § 924(o)

> ERIC D. WHITED D-1

DOMINIQUE P. FRALEY D-2

On or about May 11, 2023, in the Eastern District of Michigan, ERIC D. WHITED and DOMINIQUE P. FRALEY knowingly and unlawfully combined, conspired, confederated, and agreed with each other to carry a firearm, that is, a Rock Island Armory, Model 1911A1, .45 caliber, semi-automatic pistol, during and in relation to a drug trafficking crime for which they may be prosecuted in a court of the United States, that is, possession with intent to distribute cocaine base, in violation of Title 21, United States Code, Section 841(a).

All in violation of Title 18, United States Code, Section 924(o).

COUNT TWO FELON IN POSSESSION OF A FIREARM 18 U.S.C. §§ 922(g)(1) AND 2

- D-1 ERIC D. WHITED
- D-2 DOMINIQUE P. FRALEY

On or about May 11, 2023, in the Eastern District of Michigan, aided and abetted by DOMINIQUE P. FRALEY, ERIC D. WHITED, knowing he had been previously convicted of an offense punishable by a term of imprisonment exceeding one year, knowingly possessed, in and affecting commerce, a firearm, that is, a Rock Island Armory, Model 1911A1, .45 caliber, semi-automatic pistol, in violation of Title 18, United States Code, Section 922(g)(1).

COUNT THREE FELON IN POSSESSION OF A FIREARM 18 U.S.C. § 922(g)(1)

D-2 DOMINIQUE P. FRALEY

On or about September 17, 2022, in the Eastern District of Michigan, DOMINIQUE P. FRALEY, knowing he had been previously convicted of an offense punishable by a term of imprisonment exceeding one year, knowingly possessed, in

and affecting commerce, a firearm, that is, an SCCY Industries, 9mm caliber, semiautomatic pistol, in violation of Title 18, United States Code, Section 922(g)(1).

COUNT FOUR FELON IN POSSESSION OF A FIREARM 18 U.S.C. § 922(g)(1)

D-2 DOMINIQUE P. FRALEY

On or about November 22, 2020, in the Eastern District of Michigan, DOMINIQUE P. FRALEY, knowing he had been previously convicted of an offense punishable by a term of imprisonment exceeding one year, knowingly possessed, in and affecting commerce, a firearm, that is, a Taurus, Model G4, 9mm caliber, semi-automatic pistol, in violation of Title 18, United States Code, Section 922(g)(1).

FORFEITURE ALLEGATIONS 18 U.S.C. § 924(d)(1)

The allegations contained in Counts One, Two, Three, and Four of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 924(d)(1).

Upon conviction of an offense charged in Counts One, Two, Three, and Four of this Indictment, ERIC D. WHITED and DOMINIQUE P. FRALEY shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1), any firearm or ammunition involved in said offense including, but not limited to, a Rock Island Armory, Model 1911A1, .45 caliber, semi-automatic pistol; an SCCY

Industries, 9mm caliber, semi-automatic pistol; and a Taurus, Model G4, 9mm caliber, semi-automatic pistol.

THIS IS A TRUE BILL.

Dated: June 21, 2023

s/GRAND JURY FORPERSON GRAND JURY FOREPERSON

DAWN N. ISON United States Attorney

s/ANTHONY P. VANCE

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P61148

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Companion Case information MUST be completed by AUS

United States District Court Eastern District of Michigan	MJ: lvy		: Kumar, Shalina ט. y, Curtis 06-21-2023	
NOTE: It is the responsibility of the Assistant U.S	. Attorney signing this form to co	18.105.1	USA v. Eric Whited, et al (tt)	
Companion Case Information		Companion Case Number:		
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :		Judge Assigned:		
☐ Yes ☑ No		AUSA's Initials: A∨		
Case Title: USA v. Dominio	que <u>Fraley et. al.</u>			
County where offense occ	urred: Genesee			
Check One: ☑ Felony	Mi	sdemeanor	☐ Petty	
X Indictment/In		prior complai	nt [Case number: 23-mj-30193] [Complete Superseding section below].	
Superseding Case Informati	on			_
Superseding to Case No:		Judg	e:	
Corrects errors; no add	inated; no additional char itional charges or defend ses, different charges or at matter but adds the add	ants. adds counts.		
Defendant name	<u>Ch</u>	<u>arges</u>	Prior Complaint (if applicable	1
Please take notice that the below the above captioned case.	v listed Assistant Unit	ted States A	ttorney is the attorney of record for	or
June 21, 2023	s/ANTHOI	NY P. VANC	E	
Date	210 Feder 600 Churc Flint, Mich Telephone	United State ral Building	-5177	

03/11/2013

¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.